

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

MDL No. 2327

WAVE 1 CASES ON ATTACHED EXHIBIT A

**PLAINTIFFS' AMENDED MOTION TO EXCLUDE THE OPINIONS AND
TESTIMONY OF THOMAS C. WRIGHT, JR., M.D.**

Plaintiffs in actions listed on attached Exhibit A, pursuant to Federal Rule of Evidence 702, 403, 104 and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), hereby submit this Amended Motion to Exclude the Testimony of Thomas C. Wright, Jr., M.D. Defendant Ethicon has designated Dr. Wright, a pathologist with little to no clinical experience, to offer clinical medical opinions regarding pelvic organ prolapse (POP). The Court should exclude certain opinions of Dr. Wright because he attempts to opine on subjects well outside his expertise. In support of this motion, Plaintiffs have submitted a memorandum of law and also rely upon the following attached exhibits:

1. A true copy of the Deposition of Dr. Thomas C. Wright, Jr., M.D., is attached hereto as Exhibit B.
2. A true copy of the Expert Report of Thomas C. Wright, Jr., M.D. is attached hereto as Exhibit C.

Specifically, Dr. Wright, a pathologist, attempts to offer unqualified expert opinions regarding the causes of pelvic organ prolapse (POP), treatment options for POP, and success and failure rates of POP treatment. As set forth more fully in Plaintiffs' Amended Memorandum in Support of Its Motion, the Court should exclude the testimony of Defendant's expert witness Thomas C. Wright, Jr., M.D.

Dated: April 20, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on April 20, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

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